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2 **UNITED STATES DISTRICT COURT**
3 **CENTRAL DISTRICT OF CALIFORNIA**
4

5 BERNADINE GRIFFITH, et al,
6 Plaintiff,
7 vs.
8 TIKTOK, INC, a corporation;
9 BYTEDANCE, INC., a corporation,
10 Defendants.

11 CASE NO. 5:23-cv-00964-SB-E
12

13 **DECLARATION OF ERIC
14 SCHACHTER IN SUPPORT OF
15 PLAINTIFFS' MOTION FOR
16 CLASS CERTIFICATION AND
17 APPOINTMENT OF CLASS
18 REPRESENTATIVES AND CLASS
19 COUNSEL**

20 **REDACTED VERSION OF
21 DOCUMENT PROPOSED TO BE
22 FILED UNDER SEAL**

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DECLARATION OF ERIC SCHACHTER

I, Eric Schachter, hereby declare as follows:

3 1. I am a Senior Vice President with A.B. Data, Ltd. (“A.B. Data”). I am
4 familiar with the facts contained herein based upon my personal knowledge and
5 upon information provided by Plaintiffs’ Counsel, my associates, and A.B. Data
6 staff members, and if called as a witness, could and would testify competently
7 thereto. I submit this declaration at the request of Plaintiffs’ Counsel in connection
8 with the above-captioned action (the “Action”).

9 2. I am being compensated at a rate of \$350 per hour in connection with
10 this declaration. It is my understanding that, if a class is certified, Plaintiffs'
11 Counsel would ask A.B. Data to submit a proposal for notice and claims
12 administration services and that the proposal would be subject to competitive
13 bidding.

14 3. A.B. Data has been appointed as notice, claims, and/or settlement
15 administrator in hundreds of class actions, administering some of the largest and
16 most complex notice and claims administration programs of all time, involving all
17 aspects of media, direct, and third-party notice programs, data management and
18 analysis, claims administration, and settlement fund distribution. A profile of A.B.
19 Data's background and capabilities, including representative case and client lists, is
20 attached as **Exhibit A**.

21 4. I have over 20 years of experience in class action administration
22 implementing and maintaining notice plans and claims administration programs in
23 hundreds of class action cases and related proceedings, including privacy class
24 actions; complex consumer, antitrust, and securities class actions; Securities and
25 Exchange Commission settlements and related distributions; and civil rights,
26 employment, and insurance class actions.

27 5. I understand this case has been brought against Defendants on behalf of
28 a putative class. I understand that Plaintiffs seek to certify the following classes and

1 subclasses:

2 **Class 1: Nationwide Pixel Class:** All natural persons residing in the United
3 States who visited a website using the TikTok Pixel from March 2022 to the present,
4 and who have never been registered users of the TikTok app or held any TikTok
5 account.

6 **Subclass 1: California Pixel Subclass:** All natural persons residing in the
7 state of California who visited a website using the TikTok Pixel from March 2022 to
8 the present, and who have never been registered users of the TikTok app or held any
9 TikTok account.

10 **Class 2: Nationwide Pixel and Events API Class:** All natural persons
11 residing in the United States who visited a website using the TikTok Pixel and
12 whose server uses the TikTok Events API from March 2022 to the present, and who
13 have never been registered users of the TikTok app or held any TikTok account.

14 **Subclass 2: California Pixel and Events API Subclass:** All natural persons
15 residing in the state of California who visited a website using the TikTok Pixel and
16 whose server uses the TikTok Events API from March 2022 to the present, and who
17 have never been registered users of the TikTok app or held any TikTok account.

18 **Class 3: Nationwide Pixel Cookie-Blocking Class:** All natural persons
19 residing in the United States who visited a website using the TikTok Pixel from
20 March 2022 to the present, who have never been registered users of the TikTok app
21 or held any TikTok account, and who had web browser or system settings turned on
22 to block third-party cookies.

23 **Subclass 3: California Pixel Cookie-Blocking Subclass:** All natural persons
24 residing in the state of California who visited a website using the TikTok Pixel from
25 March 2022 to the present, who have never been registered users of the TikTok app
26 or held any TikTok account, and who had web browser or system settings turned on
27 to block third-party cookies.

28

1 **Class 4: Nationwide Pixel and Events API Cookie-Blocking Class:** All
2 natural persons residing in the United States who visited a website using the TikTok
3 Pixel and whose server uses the TikTok Events API from March 2022 to the
4 present, who have never been registered users of the TikTok app or held any TikTok
5 account, and who had web browser or system settings turned on to block third-party
6 cookies.

7 **Subclass 4: California Pixel and Events API Cookie-Blocking Subclass:**
8 All natural persons residing in the state of California who visited a website using the
9 TikTok Pixel and whose server uses the TikTok Events API from March 2022 to the
10 present, who have never been registered users of the TikTok app or held any TikTok
11 account, and who had web browser or system settings turned on to block third-party
12 cookies.

13 **Class 5: Nationwide ECPA Class:** All natural persons residing in the United
14 States who have never been registered users of the TikTok app or held any TikTok
15 account, and, from March 2022 to the present, visited a website using the TikTok
16 Pixel but without “Search” as an optional event from the TikTok Pixel configuration
17 menu.

18 **Subclass 5: California ECPA Subclass:** All natural persons residing in the
19 state of California who have never been registered users of the TikTok app or held
20 any TikTok account, and, from March 2022 to the present, visited a website using
21 the TikTok Pixel but without “Search” as an optional event from the TikTok Pixel
22 configuration menu.

23 6. I understand that, in the alternative, Plaintiffs seek to certify the
24 following classes and subclasses:

25 **Class 6: The Rite Aid Nationwide Class:** All natural persons residing in the
26 United States who visited the Rite Aid website from March 2022 to the present, and
27 who have never been registered users of the TikTok app or held any TikTok
28 account.

1 **Subclass 6: The Rite Aid California Subclass:** All natural persons residing
2 in the state of California who visited the Rite Aid website from March 2022 to the
3 present, and who have never been registered users of the TikTok app or held any
4 TikTok account.

5 **Class 7: The Hulu Nationwide Class:** All natural persons residing in the
6 United States who visited the Hulu website from March 2022 to the present, and
7 who have never been registered users of the TikTok app or held any TikTok
8 account.

9 **Subclass 7: The Hulu California Subclass:** All natural persons residing in
10 the state of California who visited the Hulu website from March 2022 to the present,
11 and who have never been registered users of the TikTok app or held any TikTok
12 account.

13 **Class 8: The Etsy Nationwide Class:** All natural persons residing in the
14 United States who visited the Etsy website from March 2022 to the present, and who
15 have never been registered users of the TikTok app or held any TikTok account.

16 **Subclass 8: The Etsy California Subclass:** All natural persons residing in
17 the state of California who visited the Etsy website from March 2022 to the present,
18 and who have never been registered users of the TikTok app or held any TikTok
19 account.

20 **Class 9: The Upwork Nationwide Class:** All natural persons residing in the
21 United States who visited the Upwork website from March 2022 to the present, and
22 who have never been registered users of the TikTok app or held any TikTok
23 account.

24 **Subclass 9: The Upwork California Subclass:** All natural persons residing
25 in the state of California who visited the Upwork website from March 2022 to the
26 present, and who have never been registered users of the TikTok app or held any
27 TikTok account.

28

Class 10: The Sweetwater Nationwide Class: All natural persons residing in the United States who visited the Sweetwater website from March 2022 to the present, and who have never been registered users of the TikTok app or held any TikTok account.

5 7. I was asked by Plaintiffs' Counsel to serve as a testifying expert in
6 *Griffith v. TikTok*, 5:23-cv-00964 (C.D. Cal.), specifically regarding the feasibility
7 of notice and administration. I will assess whether A.B. Data could identify and
8 provide notice of certification to class members and, if necessary, verify claims
9 received from class (and subclass) members in the event of a settlement or
10 judgment.

Notice Approach

12 8. A.B. Data's proposed approach to provide notice in this matter would
13 use customary procedures that have been widely adopted in class actions. Any
14 notice program would be designed to provide notice that complies with Rule 23 of
15 the Federal Rules of Civil Procedure and is consistent with those approved by courts
16 and implemented for similar cases.

17 9. If a comprehensive list of contact information is available, either in the
18 form of mailing or email addresses, direct notice could be utilized to provide notice.
19 Paid and earned media would supplement direct notice as needed with to comply
20 with due process requirements.

21 10. It would be reasonable and appropriate to provide notice through
22 measurable paid and earned media. Since the class is numerous and consists of
23 visitors to numerous websites and contact information for class members is not
24 available to provide direct notice, “notice by publication will suffice under Rule
25 23(c)(2) and under the due process clause.”¹

²⁷ ²⁸ ¹ *Carlough v. Amchem Prods., Inc.*, 158 F.R.D. 314, 325 (E.D. Pa. 1993) (citing *Mullane*, 339 U.S. 306, 317-18 (1950)).

1 11. Previously, A.B. Data has designed and implemented Court-approved
2 notice programs where media (publication) notice was used as the primary means to
3 provide due process notice to the class. For example, in *In re Qualcomm Antitrust*
4 *Litigation*, No. 17-md-02773, (N.D. Cal.), a comprehensive list of contact
5 information was not able to be created for the class of cell phone purchasers, so a
6 media notice program was used to provide due process notice, reaching over 70% of
7 the class through measurable paid media. In *In re Broiler Chicken Antitrust*
8 *Litigation*, No. 1:16-cv-08637 (N.D. Ill.) (End-User Consumer Plaintiffs); *In re*
9 *Pork Antitrust Litigation*, No. 0:18-cv-01776 (D. Minn.) (All Consumer Indirect
10 Purchaser Actions); and *Mackmin v. Visa Inc.* No. 1:11-cv-01831 (D.D.C.), the
11 classes were numerous and broad, and contact information for direct notice was
12 available for only a small portion of the class. Because a significant portion of the
13 class was unknown, measurable paid media notice was used to ensure adequate
14 reach and effective notice. Pharmaceutical and antitrust class action cases
15 frequently use media notice to reach unknown consumer classes and meet due
16 process standards. In *In re Opana ER Antitrust Litigation*, No. 1:14-cv-10150 (N.D.
17 Ill.), and *In re Namenda Indirect Purchaser Antitrust Litigation*, No. 1:15-cv-06549
18 (S.D.N.Y), direct notice was provided to third-party payors, but consumer class
19 members received notice solely through media notice.

20 12. As described below, A.B. Data uses methodology and standard
21 measurement tools used in the media planning and advertising industry to design
22 and measure the adequacy of notice programs that include paid media. To design
23 the paid media portion of a notice program, A.B. Data uses syndicated, accredited
24 research to select an equivalent demographic profile, known as a target audience,
25 that best represents potential class members; reviews the target audience's
26 demographics and media consumption habits; analyzes, measures, and selects media
27 vehicles that will effectively and efficiently reach the target audience; and builds an
28

1 overall recommended paid media plan using recognized media measurement tools to
 2 quantify and ensure adequacy of the notice.

3 13. To evaluate what media options might be considered for this case, A.B.
 4 Data's media experts examined 2023 syndicated data from the nationally accredited
 5 resource, MRI-Simmons.² MRI-Simmons is a media and marketing research firm
 6 that provides syndicated data on audience size, composition, and other relevant
 7 factors pertaining to major media, including broadcast, magazines, newspapers,
 8 digital, and outdoor advertising. It is also a source of information about products,
 9 services, and in-depth consumer demographic and lifestyle/psychographic
 10 characteristics. Advertising agencies and other marketing professionals use it to
 11 understand the demographics, interests, and activities of a targeted group of people
 12 and as an aid to select proper media to reach that target audience. This tool is
 13 instrumental when developing and measuring the estimated net reach³ of a particular
 14 notice program and as part of the accepted methodology that the Federal Judicial
 15 Center's *Judges' Class Action Notice and Claims Process Checklist and Plain*
 16 *Language Guide* advises be used in class action notice.

17

18

19 ² The MRI Simmons Survey of the American Consumer is the country's largest, most
 20 comprehensive, and most reliable consumer and media and product/service usage
 21 database. Data from the Survey of the American Consumer, conducted continuously
 22 since 1979, is used in the majority of media and marketing plans written in the United
 23 States. The firm's multidimensional database is the largest and most reliable source
 24 for integrated media planning. About 450 U.S. advertising agencies, including 90 of
 25 the top 100, subscribe to MRI Simmons Research, along with A.B. Data and more
 26 than 200 national marketers. MRI Simmons offers the most detailed and
 27 representative picture of U.S. demographics and lifestyles, including information on
 28 usage of nearly 6,000 product and service brands across 550 categories, the magazines
 and newspapers audiences read, the websites they look at, the television programs
 they watch, and the radio stations they listen to.

29 ³ Reach is the estimated percentage of a target audience reached through a specific
 30 media vehicle or combination of media vehicles.

1 13. MRI-Simmons does not provide specific information on people who
2 visited a website with the TikTok Pixel and TikTok Events API software installed
3 and who have never been registered users of the TikTok app or held any TikTok
4 account. However, given that the TikTok Pixel and TikTok Events API software
5 was allegedly installed on hundreds of thousands of websites during the class
6 period, A.B. Data identified the representative target audience as being “adults 18+
7 who used internet in the past 30 days” (“Internet Users”) and reviewed the
8 characteristics, demographics, and media information about this audience. This
9 broad, encompassing target audience would ensure the paid media delivery would
10 adequately reach potential class members.

11 14. Heavy use of digital media is appropriate for notice in this case, as it is
12 known that class members are predominantly, and indeed defined by being, online.
13 Notice including digital media has become commonplace in class action notice
14 programs and, in our experience, is a practicable way to provide notice to class
15 members. Digital media (such as banner advertisements) appears directly in front of
16 the consumer when he or she visits a webpage or mobile application in which the
17 banner advertisement appears or sees a social media post about the case. Individuals
18 are also easily able to access additional information (such as the Long-Form Notice)
19 through digital advertising; they simply need to click on the banner or link.

20 15. It is my understanding from counsel that TikTok has provided a list of
21 websites that have used the TikTok Pixel and whose servers have used the TikTok
22 Events API. Accordingly, A.B. Data can use digital media banner advertisements to
23 specifically appear on those websites and/or target likely visitors to those websites
24 to notify potential class members.

25 16. Banner and social media ads could be placed on a variety of websites
26 and mobile applications, to maximize exposure to potential class members and
27 deliver the reach and number of impressions required to comply with Rule 23 of the
28 Federal Rules of Civil Procedure. Digital impressions could be delivered to widely

1 visited websites and applications by Internet Users.

2 17. A.B. Data has the capability to implement a media campaign across
3 digital networks like Google Display Network and Google AdWords, and social
4 media platforms such as Facebook, Instagram, and YouTube. Over 87% of Internet
5 Users used any social media, photo, and video-sharing services; 65% used
6 Facebook; 39% used Instagram; and 54% used YouTube in the past 30 days.⁴ A
7 case-specific Facebook page would be created as a landing page for the links in
8 Facebook and Instagram newsfeed ads. Because TikTok users are not part of the
9 class, the above percentages understate the fraction of class members who visit
10 those platforms.

11 18. All networks and social media platforms that A.B. Data utilizes are
12 members of the Digital Advertising Alliance (“DAA”).⁵ Companies and
13 organizations that join the DAA commit to using consumer information responsibly
14 for marketing purposes.

15 19. Based upon information from MRI-Simmons and with further analysis,
16 other traditional media platforms, such as television or radio could also be
17 considered.

18 20. To further supplement publication notice efforts, it is recommended
19 that the notice plan include earned media, such as distributing a news release via PR
20 Newswire’s US1 Newsline. The press release would reach thousands of traditional
21 media outlets (television, radio, newspapers, magazines), news websites, and
22

23 ⁴ MRI-Simmons 2023 Doublebase Study.

24 ⁵ The Digital Advertising Alliance (DAA) is an independent non-profit organization
25 led by leading advertising and marketing trade associations. It establishes and
26 enforces responsible privacy practices across industries for relevant digital
27 advertising. These multifaceted principles provide consumers with enhanced
28 transparency and control and are applied to multi-site data and cross-app data gathered
in either desktop or mobile environments.

1 journalists nationwide and could help the case gain more attention. By issuing a
2 news release, media outlets across the country, such as local television networks and
3 newspapers, would be able to run the story on their platforms, which would provide
4 additional notice to class members. Tweets from PR Newswire and A.B. Data's X
5 (formerly Twitter) accounts would also amplify information about the case to those
6 in the news media and other followers.

7 21. Similarly, if a list of the websites that had TikTok Pixel or TikTok
8 Events API software installed could be provided, those websites could be asked to
9 display a banner advertisement in a prominent position on their homepages, so they
10 are easily seen when visitors first open the website page or application. That way,
11 potential class members are made aware of the case in the same location(s) where
12 the TikTok Pixel or TikTok Events API software was enabled.

13 22. Using a notice program designed with paid and earned media provides
14 class members with multiple exposure opportunities to media vehicles carrying the
15 notice. This type of notice, in combination with direct notice or as a standalone
16 program, can deliver a reach⁶ and frequency⁷ that conforms to the requirements of
17 Rule 23 of the Federal Rules of Civil Procedure and due process. To evaluate the
18 strength and efficiency of paid media,⁸ A.B. Data uses MRI-Simmons and
19 Comscore⁹ to calculate the estimated reach and frequency against the target

20
21 ⁶ Reach is the estimated percentage of a target audience reached through a specific
22 media vehicle or combination of media vehicles.

23 ⁷ Frequency is the estimated average number of opportunities and audience member
24 has to see the notice.

25 ⁸ Targeted Internet advertising and earned media are not measured for this target
26 audience, so their contribution to the overall reach of the media would not be
calculated.

27 ⁹ Comscore is a global Internet information provider that maintains a proprietary
28 database of more than two million consumers. These customers have given Comscore

1 audience. It ensures the notice program will provide a reach similar to those that
 2 courts have approved previously and within the range recommended and considered
 3 reasonable by The Federal Judicial Center's *Judges' Class Action Notice and Claims*
 4 *Process Checklist and Plain Language Guide*.¹⁰

5 23. In addition, all notices should be written in plain language, include all
 6 required information about class members' rights and options, and meet the notice
 7 requirements in the Federal Rules of Civil Procedure Rule 23.

8 **Claims Administration and Data Verification**

9 24. Notice would direct potential class members to a case website and toll-
 10 free number that contain information about the Action and relevant deadlines.

11 25. The website would allow visitors to access and download important
 12 documents and other Court pleadings and would be secure, with a "https"
 13 designation. It could include an online portal to allow individuals to register to be
 14 notified about important updates in the Action.

15 26. If there is a future settlement or judgment, it is possible to provide
 16 claims and distribution services, including determining each class member's
 17 distribution amount and preparing and sending distribution payments to eligible
 18 class members based on any Court orders or plan of allocation. Class members who
 19 wish to be potentially eligible to receive a payment from any funds would be
 20 required to complete and submit a properly executed claim form along with any
 21 required supporting documents.

22
 23 _____
 24 permission to monitor their browsing and transaction behavior, including online and
 25 offline purchasing. Leading companies and advertising agencies use this database for
 26 detailed insights into consumer behavior and Internet usage.

27 26¹⁰ The *Judges' Class Action Notice and Claims Process Checklist and Plain*
 28 *Language Guide* states: "The lynchpin in an objective determination of the adequacy
 of a proposed notice effort is whether all the notice efforts together will reach a high
 percentage of the class. It is reasonable to reach between 70-95%."

1 27. The case website could include a portal to allow class members to
2 submit a claim and provide information that A.B. Data can use to verify a claimant's
3 class membership.

4 28. Data from TikTok could be used to exclude TikTok account holders.
5 The claim form would collect standard information such as name, address within the
6 United States, phone number, email address, and other contact information. This
7 information could be cross-checked against TikTok's user data to exclude TikTok
8 account holders.

9 29. I also believe that TikTok's own data could potentially be used for
10 further verification. I understand from counsel that Dr. Shafiq – Plaintiffs' technical
11 expert – has found that TikTok [REDACTED]
12 [REDACTED]
13 [REDACTED]
14 [REDACTED]
15 [REDACTED], if a claimant submits their
16 [REDACTED]
17 [REDACTED], I understand that we would be able to verify that information by cross-
18 referencing against [REDACTED] – to the extent that the relevant data has been
19 preserved.

20 30. All information provided by potential class members would be
21 imported into a secure database to electronically analyze and process the
22 submissions. The claims administration process includes eliminating erroneous and
23 duplicative claims and confirming remaining claimants are in the class.

24 31. As stated above, A.B. Data has the computing power and data storage
25 facilities necessary to conduct claims administration involving very large datasets
26 and to protect the security of all information that it receives.

27 32. After claims have been fully processed, quality assurance reviews
28 performed, and final administrative determinations have been made as to which

1 claims are valid, an administrative report on the claims received can be presented to
2 the Court. Thereafter, upon Court approval, any funds would be distributed to
3 eligible class members *pro rata* based upon the number of valid claims and amount
4 available for distribution and calculated based on any Court-approved plan of
5 allocation.

6 33. The procedure described above is the standard claims administration
7 process for all class action settlements handled by A.B. Data.

CONCLUSION

9 34. It is my opinion, based on my individual expertise and experience, that
10 the notice and claims administration methodologies described herein would be the
11 best practicable under the circumstances for this Action, are consistent with those
12 used in other class actions, and would effectively reach unidentified class members.

13 I declare under penalty of perjury that the foregoing is true and correct.

14 Executed this 21st of June, 2024 in Milwaukee, Wisconsin.



Eric Schachter
A.B. Data, Ltd.
Milwaukee, Wisconsin

EXHIBIT A



Headquarters
600 A.B. Data Drive
Milwaukee, WI 53217
P: 866-217-4470
F: 414-961-3099

New York
One Battery Park Plaza
32nd Floor
New York, NY 10004
P: 646-290-9137

Washington DC
915 15th St., NW, Ste. 300
Washington, DC 20005
P: 202-618-2900
F: 202-462-2085

Florida
5080 PGA Boulevard, Ste. 209
Palm Beach Gardens, FL 33418
P: 561-336-1801
F: 561-252-7720

Israel
19 Weissburg Street
Tel Aviv 69358
Israel
P: +972 (3) 720-8782



CAPABILITIES

About A.B. Data

 Founded in 1981, **A.B. Data has earned a reputation** for expertly managing the complexities of class action administration in consumer, antitrust, securities, Securities and Exchange Commission (SEC) enforcement actions, and ERISA. Attorneys General, employment, civil rights, insurance, environmental, wage and hour, and other class action cases. **A.B. Data's work in all aspects of class action administration** has been perfected by decades of experience in hundreds of class action cases involving billions of dollars in total settlements. Dedicated professionals deliver **A.B. Data's all-inclusive services**, working in partnership with its clients to administer their class action cases effectively, efficiently, and affordably, regardless of size or scope.

A.B. Data offers unmatched resources and capacity and is capable of expertly administering any class action notice, settlement, and/or fund administration. Whether notifying millions of class members in the United States or throughout the world, processing millions of claims, distributing payments digitally via A.B. Data's Digital PayPortalSM, or printing and distributing millions of checks, **A.B. Data matches its talent and technology** to the specific needs of its clients, delivering unparalleled service on time and on budget without ever compromising quality.

Location, Ownership Structure

 **A.B. Data is an independently owned**, more than 40-year-old, Milwaukee, Wisconsin-based company that prides itself on its vast expertise and industry-leading innovations. We like to remind our clients and partners that we're not just a class action administration company, but a group of experienced, dedicated professionals who believe that relationships are just as important as the accurate and timely management of class action administrations. In other words, we are people who do business with people.

Services

 **Every A.B. Data client is deserving of the best job we can put forward.** A.B. Data makes class action administration easy for our clients with clarity, convenience, and efficiency. Our priority is to navigate the intricacies of our clients' matters and deliver successful results by using our solid expertise, advanced technology, and top-quality products and services. We pay attention to the details and get it right the first time.

We aim to provide our clients the full experience of a truly collaborative working relationship. It is why we believe much of our success originates from our philosophy of "people doing business with people."

Services

All Digital – From Notice to Distribution

A.B. Data is uniquely positioned to design, implement, and maintain notice and settlement administration programs using an innovative, "all-digital" approach that replaces the more traditional and less efficient methods of administration, such as newspaper ads, mailed notices, and paper checks. Many of our recent proposed notice plans and claim programs utilize the latest technologies such as microtargeted digital ads for notice, streamlined online claims, and distributing settlement funds electronically using a digital paywall. These methods provide significant cost savings, are consistent with the amendments to Rule 23 that are now in effect, and importantly provide much-needed alignment of class action notice and administration with current consumer behaviors.

Pre-Settlement Consultation

The pre-settlement consultation is a collaborative session designed to help A.B. Data clients prepare a stronger case. Our support teams simplify the task of sorting through a maze of documents during investigation and discovery, streamlining the process and preserving fund assets. From there, we assist with fully interactive media packages for court presentations and settlement negotiations. A.B. Data works closely with our clients, offering expert testimony on documents, processing, class and notice manageability, and proposed plans of allocation.

Media Services

A.B. Data continues to earn our reputation as the early innovator in integrating advanced micro-targeting techniques, including contextual targeting, behavioral targeting, and predictive modeling. Coupled with inventive digital media strategies to drive claims, case-specific banner ad development, class member research, and comScore analysis services, our multi-tiered media programs are designed to cost-effectively deliver notice to potential class members and increase claims rates.

Notice Administration

In A.B. Data, clients have a comprehensive resource with a depth of experience in direct notice. Our compliance and understanding of Rule 23 of the Federal Rules of Civil Procedure are crucial in meeting the "plain language" legal requirements for any campaign. From our sophisticated digital media capabilities and extensive global experience with class member research, our experts create notice documents that are easily understandable and cost-efficient to produce. We consult with our clients to deliver notice documents from multi-page, mailed, or emailed notice packets to concise postcards that establish the most influential and cost-effective means of communicating with potential claimants.

Claims Processing

A.B. Data continues to bring game-changing technologies to improve the speed and precision in claims processing. Our robust system for online claims submissions allows us to meticulously verify data and documentation, preserve and authenticate claims, and calculate and verify settlement amounts. In addition, our data network infrastructure includes on-site data storage, backup, contingency plans, and security for electronic and hard copy claim filings. It is all part of a total commitment to be the most innovative and comprehensive resource in the industry. At A.B. Data, we take pride in having the in-house capacity to process millions of pages, as well as the organizational integrity to treat every claim as if it were the only one.

Contact Center

A.B. Data's Contact Center is comprised of a full staff that is trained on and equipped with online and telecommunication systems to monitor and connect with class members. Associates routinely monitor class member communication for all class action administrations, including antitrust, consumer, and securities.

Utilizing monitoring software, associates watch multiple social media channels simultaneously, allowing for instantaneous routing of inquiries and interaction with claimants. Detailed and concise analytical reports outlining Contact Center activities are always provided.

Our Contact Center and case websites are capable of handling millions of class member engagements, as recently displayed in a campaign which garnered over 1.2 million website visits in two months and had more than 72,500 Facebook engagements. Facebook comments and threads are monitored and claimants are guided to the website for more information. Google AdWords and display advertising have also brought hundreds of thousands of visitors to various case websites.

A.B. Data's Contact Center also has Spanish language associates in-house and we can accommodate any language, given proper lead time. Traditional call center facilities are also available, if needed.

Case Websites

We offer a state-of-the-art technology platform that supports every step of our class action administration process. Our expert marketing professionals design customized case-specific websites that provide potential class members easy access to case information, critical documents, important deadlines, as well as the capability to file claim forms and register for future mailings about the case. Claimants can use the website to elect to receive their settlement payments by mail or by one of several digital payment options, all accessible by mobile devices.

Settlement Fund Distribution

From complete escrow services to establishment of qualified settlement funds, check printing and mailing, electronic cash or stock distribution and tax services, A.B. Data has always provided a full-service solution to Settlement Fund Distribution. Our IT team has decades of experience in developing and implementing fast, secure databases and claims administration systems that ensure class members receive the correct amount in their settlement disbursement. Today's digital capabilities allow even greater convenience for class members. In certain instances, claimants can now elect to

instantaneously receive settlement payments through popular digital-payment options, such as PayPal, Amazon, and virtual debit cards.

A.B. Data's Leadership



A.B. Data's administration team is composed of the following key executives, who collectively have decades of experience settling and administering class actions:

Bruce A. Arbit, Co-Managing Director and one of the founders of the A.B. Data Group, serves as Chairman of the Board and oversees the day-to-day operations of the A.B. Data Group of companies, employing almost 400 people in the United States and Israel. Mr. Arbit is also Chairman of the Board of Integrated Mail Industries, Ltd. and has served as a member of the Board of Directors of University National Bank and State Financial Bank. He is the past Chairman of Asset Development Group, Inc., Home Source One, and American Deposit Management and is a member of the National Direct Marketing Association, the Direct Marketing Fundraising Association, and the American Association of Political Consultants. He was named 1996 Direct Marketer of the Year by the Wisconsin Direct Marketing Association.

A.B. Data's work in class action litigation support began with the Court selecting A.B. Data to oversee the restitution effort in the now-famous Swiss Banks Class Action Case, the International Commission on Holocaust Era Insurance Claims, and every other Holocaust Era Asset Restitution program, in which it was the company's job to identify, contact, and inform survivors of the Holocaust. A.B. Data delivered by reaching out to millions of people in 109 countries who spoke more than 30 languages. Since those days, Mr. Arbit has guided the class action division through phenomenal growth and success. Today, A.B. Data manages hundreds of administrations annually that distributes billions of dollars to class members.

Thomas R. Glenn, President. Mr. Glenn's management of A.B. Data's Class Action Administration Company includes designing and implementing notice plans and settlement administration programs for antitrust, securities, and Securities and Exchange Commission settlements and SEC disgorgement fund distributions, as well as consumer, employment, insurance, and civil rights class actions. Mr. Glenn previously served as Executive Vice President at Rust Consulting and has more than 30 years of executive leadership experience.

Eric Miller, Senior Vice President. as a key member of A.B. Data's Class Action Administration Leadership Team, oversees the Case Management Department and supervises the operations and procedures of all of A.B. Data's class action administration cases. Mr. Miller is recognized in the class action administration industry as an expert on securities, SEC, consumer, product recall, product liability, general antitrust, pharmaceutical antitrust, and futures contract settlements, to name a few settlement types. Prior to joining A.B. Data, Mr. Miller served as the Client Service Director for Rust Consulting, responsible there for its securities practice area. He has more than 20 years of operations, project management, quality assurance, and training experience in the class action administration industry. In addition, Mr. Miller manages A.B. Data's office in Palm Beach Gardens, Florida.

Eric Schachter, Senior Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. He has over 15 years of experience in the legal settlement administration services industry. Mr. Schachter's responsibilities include ensuring successful implementation of claims administration services for A.B. Data's clients in accordance with settlement agreements, court orders, and service agreements. He also works closely with Project Managers to develop plans of administration to provide the highest level of effective and efficient delivery of work product. A frequent speaker on claims administration innovation and best practices at industry events nationwide, Mr. Schachter has a bachelor's degree in sociology from Syracuse University, earned his law degree at Hofstra University School of Law, and was previously an associate at Labaton Sucharow LLP in New York City.

Elaine Pang, Vice President, Media, oversees the Media Department and is responsible for the direction, development, and implementation of media notice plans for A.B. Data's clients. Ms. Pang brings more than 15 years of experience in developing and implementing multifaceted digital and traditional media for high profile complex legal notice programs. She uses her experience in class actions and advertising to provide the best practicable notice plans for large scale campaigns across domestic and international regions, and she leverages her expertise to better understand the evolving media landscape and utilize cutting-edge technology and measurement tools. Prior to entering the class action industry, Ms. Pang worked with many leading reputable brands, including General Mills, Air Wick, Jet-Dry, Comedy Central, Madison Square Garden, Radio City Music Hall, and Geox. She earned her MBA from Strayer University and holds a BS in Marketing from Pennsylvania State University. Ms. Pang's credentials include Hootsuite Social Marketing Certification, Google Adwords and Analytics Certification, and IAB Digital Media Buying and Planning Certification.

Paul Sauberer, Vice President of Quality, is responsible for overseeing quality assurance and process management, working diligently to mitigate risk, ensure exceptional quality control, and develop seamless calculation programming. Mr. Sauberer brings more than 20 years of experience as a quality assurance specialist with a leading claims-processing company where he developed extensive knowledge in securities class action administration. He is recognized as the class action administration industry's leading expert on claims and settlement administrations of futures contracts class actions.

Justin Parks, Vice President, is a member of A.B. Data's Class Action Administration Leadership Team. Mr. Parks brings extensive experience in client relations to A.B. Data's business development team. Mr. Parks has over 15 years of experience in the legal settlement administration services industry and has successfully managed and consulted on notice plans and other administrative aspects in hundreds of cases. Mr. Parks is uniquely experienced in Data Privacy matters, having consulted with clients on numerous matters stemming from data breaches as well as violations of the Illinois Biometric Information Privacy Act (BIPA), including some of the first ever Biometric Privacy related settlements in history. Mr. Parks' knowledge and understanding of the class action industry, as well as his client relationship skills, expand A.B. Data's capacity to achieve its business development and marketing goals effectively.

Steve Straub, Senior Director of Operations, started with A.B. Data in 2012 as a Claims Administrator. He moved through the ranks within the company where he spent the past five years as Senior Project Manager managing many of the complex commodities cases such as *In re LIBOR-Based Financial Instruments Antitrust Litigation*, *In re London Silver Fixing, Ltd. Antitrust Litigation*, and *Laydon v. Mizuho Bank, Ltd., et al.* Mr. Straub's performance in these roles over the past ten years, along with his comprehensive knowledge of company and industry practices and first-person experience leading the project management team, has proven him an invaluable member of the A.B. Data team.

In his role as Claimant Operations Director, his responsibilities include developing efficiencies within the operations center, which includes mailroom, call center, and claims processing areas. His areas of expertise include business process development, strategic/tactical operations planning and implementation, risk analysis, budgeting, business expansion, growth planning and implementation, cost reduction, and profit, change, and project management. Mr. Straub is well-versed in the administration of securities, consumer, and antitrust class action settlements. He earned his Juris Doctor degree from Seton Hall University School of Law in Newark, New Jersey.

Jack Ewashko, Director of Client Services, brings twenty years of industry and brokerage experience to his role with A.B. Data. He is an accomplished client manager adept at facilitating proactive communications between internal and outside parties to ensure accurate and timely deliverables. Mr. Ewashko previously held positions at two claim administration firms where he oversaw the securities administration teams and actively managed numerous high-profile matters, including the \$2.3 billion foreign exchange litigation. He notably served as Vice President, FX and Futures Operations at Millennium Management, a prominent global alternative investment management firm. As he progressed through trading, analytic, management, and consultancy roles at major banks and brokerage firms, Mr. Ewashko gained hands-on experience with vanilla and exotic securities products, including FX, commodities, mutual funds, derivatives, OTC, futures, options, credit, debt, and equities products. In the financial sector, he also worked closely with compliance and legal teams to ensure accuracy and conformity with all relevant rules and regulations regarding the marketing and sale of products, as well as the execution and processing of trades. He has held Series 4, Series 6, Series 7, and Series 63 licenses, and has been a member of the Futures Industry Association (FIA) and Financial Industry Regulatory Authority (FINRA). Mr. Ewashko earned his Bachelor of Business Administration from Long Island University, Brooklyn, New York.

Brian Devery, Director of Client Services, brings more than a decade of experience in class action administration and project management, as well as over two decades of experience as an attorney (ret.). Mr. Devery currently focuses on consumer, antitrust, employment, and other non-securities based administrations. In addition to driving project administration, he is focused on the implementation of process improvement, streamlining, and automation. Mr. Devery is admitted to practice law in State and Federal Courts of New York with his Juris Doctorate earned from the Maurice A. Deane School of Law at Hofstra University, Hempstead, New York.

Adam Walter, PMP, Director of Client Services, has nearly fifteen years of experience managing the administration of securities class action settlements and SEC disgorgements totaling more than \$4 billion. He has managed settlement programs in engagements involving some of the largest securities class action settlements and is a key contributor to the development of administration strategies that meet the evolving needs of our clients. His responsibilities include developing case administration strategies to ensure that all client and court requirements and objectives are met, overseeing daily operations of case administrations, ensuring execution of client deliverables, providing case-related legal and administration support to class counsel, overseeing notice dissemination programs, implementing complex claims-processing and allocation methodologies, establishing quality assurance and quality control procedures, and managing distribution of settlement funds. Mr. Walter holds a bachelor's degree in business administration from Florida Atlantic University, Boca Raton, Florida. He also has been an active member of the Project Management Institute since 2010 and is PMP®-certified.

Eric Nordskog, Director of Client Services, started with A.B. Data in 2012 on the operations team, managing dozens of team leads and claims administrators in the administration of legal cases and actions. In 2017, Mr. Nordskog was promoted to Project Manager, due in part to his proven ability to add consistency and efficiency to the e-claim filing process with new streamlined processes and audit practices. Today, as Senior Project Manager, he directs many of A.B. Data's securities, insurance, and

consumer cases. He regularly oversees the administration of large insurance cases, such as two recent Cigna Insurance matters that involved complex calculations and over one million class members each. He is also the primary hiring and training manager for new project managers and coordinators. Mr. Nordskog earned his Juris Doctor degree from Marquette University Law School, Milwaukee, in 2001.

Eric Schultz, MCSE, Information Technology Manager and Security Team Chairperson, has been with A.B. Data for more than 19 years, and is currently responsible for overseeing all information technology areas for all A.B. Data divisions across the United States and abroad, including network infrastructure and architecture, IT operations, data security, disaster recovery, and all physical, logical, data, and information systems security reviews and audits required by our clients or otherwise. As a Microsoft Certified Systems Engineer (MCSE) with more than 25 years of experience in information technology systems and solutions, Mr. Schultz has developed specializations in network security, infrastructure, design/architecture, telephony, and high-availability network systems.

Secure Environment



A.B. Data's facilities provide the highest level of security and customization of security procedures, including:

- A Secure Sockets Layer server
- Video monitoring
- Limited physical access to production facilities
- Lockdown mode when checks are printed
- Background checks of key employees completed prior to hire
- Frequency of police patrol – every two hours, with response time of five or fewer minutes
- Disaster recovery plan available upon request

Data Security



A.B. Data is committed to protecting the confidentiality, integrity, and availability of personal identifying information and other information it collects from our clients, investors, and class members and requires that its employees, subcontractors, consultants, service providers, and other persons and entities it retains to assist in distributions do the same. A.B. Data has developed an Information Security Policy, a suite of policies and procedures intended to cover all information security issues and bases for A.B. Data, and all of its divisions, departments, employees, vendors, and clients. A.B. Data has also recently taken the necessary, affirmative steps toward compliance with the EU's General Data Protection Regulation and the California Consumer Privacy Act.

A.B. Data has a number of high-profile clients, including the Securities and Exchange Commission (SEC), the United States Department of Justice, the Attorneys General of nearly all 50 states, other agencies of the United States government, and the Government of Israel, as well as direct banking and payment services companies with some of the most recognized brands in United States financial services and some of the largest credit card issuers in the world.

We are therefore frequently subjected to physical, logical, data, and information systems security reviews and audits. We have been compliant with our clients' security standards and have also been determined to be compliant with ISO/IEC 27001/2 and Payment Card Industry (PCI) data-security standards, the Gramm-Leach-Bliley Act (GLB) of 1999, the National Association of Insurance Commissioners (NAIC) Regulations, the Health Insurance Portability and Accountability Act (HIPAA) of 1996, and the Health Information Technology for Economic and Clinical Health Act (HITECH).

The Government of Israel has determined that A.B. Data is compliant with its rigorous security standards in connection with its work on Project HEART (Holocaust Era Asset Restitution Taskforce).

A.B. Data's fund distribution team has been audited by EisnerAmper LLP and was found compliant with class action industry standards and within 99% accuracy. EisnerAmper LLP is a full-service advisory and accounting firm and is ranked the 15th-largest accounting firm in the United States.

In addition, as part of PCI compliance requirements, A.B. Data has multiple network scans and audits from third-party companies, such as SecurityMetrics and 403 Labs, and is determined to be compliant with each of them.

Fraud Prevention and Detection



A.B. Data is at the forefront of class action fraud prevention.

A.B. Data maintains and utilizes comprehensive proprietary databases and procedures to detect fraud and prevent payment of allegedly fraudulent claims.

We review and analyze various filing patterns across all existing cases and claims. Potential fraudulent filers are reported to our clients as well as to the appropriate governmental agencies where applicable.

Representative Class Action Engagements



A.B. Data and/or its team members have successfully administered hundreds of class actions, including many major cases. Listed below are just some of the most representative or recent engagements.

Consumer & Antitrust Cases

- *In re EpiPen Marketing, Sales Practices and Antitrust Litigation*
- *In re Broiler Chicken Antitrust Litigation - Commercial (Indirect)*
- *In re Broiler Chicken Antitrust Litigation - Indirect*
- *In re Broiler Chicken Antitrust Litigation - Direct*
- *In re Pork Antitrust Litigation - Directs*
- *In re Pork Antitrust Litigation - Indirects*

- *Peter Staley, et al. v. Gilead Sciences, Inc., et al.*
- *In re: Opana ER Antitrust Litigation*
- *In re Ranbaxy Generic Drug Application Antitrust Litigation*
- *In re Valeant Pharmaceuticals Int'l, Inc. Third-Party Payor Litigation*
- *Staley, et al., v. Gilead Sciences*
- *In Re: Generic Pharmaceuticals Pricing Antitrust Litigation – Direct Purchasers*
- *Beef Direct Purchaser Antitrust Litigation*
- *BCBSM, Inc. v. Vyera Pharmaceuticals, et al. (Daraprim)*
- *In re Automobile Antitrust Cases I and II*
- *Olean Wholesale Grocery Cooperative, Inc., et al. v. Agri Stats, Inc., et al. (Turkey)*
- *Integrated Orthopedics, Inc., et al. v. UnitedHealth Group, et al.*
- *In Re: Restasis (Cyclosporine Ophthalmic Emulsion) Antitrust Litigation*
- *Vista Healthplan, Inc., et al. v. Cephalon, Inc., et al. (Provigil)*
- *Jeffrey Koenig, et al. v. Vizio, Inc.*
- *Wit, et al. v. United Behavioral Health*
- *Weiss, et al. v. SunPower Corporation*
- *Smith, et al. v. FirstEnergy Corp., et al.*
- *Resendez, et al. v. Precision Castparts Corp. and PCC Structural, Inc.*
- *Julian, et al. v. TTE Technology, Inc., dba TCL North America*
- *Eugenio and Rosa Contreras v. Nationstar Mortgage LLC*
- *Phil Shin, et al. v. Plantronics, Inc.*
- *In re: Qualcomm Antitrust Litigation*
- *In re Resistors Antitrust Litigation*
- *The Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. and Sandoz Inc. ("Lovenox Antitrust Matter")*
- *William Kivett, et al. v. Flagstar Bank, FSB, and DOES 1-100, inclusive*
- *Adelphia, Inc. v. Heritage-Crystal Clean, Inc.*
- *LLE One, LLC, et al. v. Facebook, Inc.*
- *Bach Enterprises, Inc., et al. v. Advanced Disposal Services South, Inc., et al.*
- *JWG Inc., et al. v. Advanced Disposal Services Jacksonville, L.L.C., et al.*
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*
- *In re GSE Bonds Antitrust Litigation*
- *Wave Lengths Hair Salons of Florida, Inc., et al. v. CBL & Associates Properties, Inc., et al.*
- *In re Loestrin 24 FE Antitrust Litigation*
- *Office of the Attorney General, Department of Legal Affairs, State of Florida v. Pultegroup, Inc. and Pulte Home Company, LLC*
- *In re Cigna-American Specialties Health Administration Fee Litigation*
- *In re: Intuniv Antitrust Litigation*
- *High Street, et al. v. Cigna Corporation, et al.*
- *Gordon Fair, et al. v. The Archdiocese of San Francisco, San Mateo, and Marin County*
- *Bizzarro, et al. v. Ocean County Department of Corrections, et al.*
- *Meeker, et al. v. Bullseye Glass Co.*
- *MSPA Claims 1, LLC v. Ocean Harbor Casualty Insurance Company*
- *Tennille v. Western Union Company - Arizona*
- *Garner, et al. v. Atherotech Holdings, Inc. and Garner, et al. v. Behrman Brothers IV, LLC, et al.*
- *Robinson, et al. v. Escallate, LLC*
- *Josefina Valle and Wilfredo Valle, et al. v. Popular Community Bank f/k/a Banco Popular North America*
- *Vision Construction Ent., Inc. v. Waste Pro USA, Inc. and Waste Pro USA, Inc. and Waste Pro of Florida, Inc.*

- *Plumley v. Erickson Retirement Communities, et al.*
- *In re London Silver Fixing, Ltd. Antitrust Litigation*
- *Ploss v. Kraft Foods Group, Inc. and Mondelēz Global LLC*
- *In re Mexican Government Bonds Antitrust Litigation*
- *In re Ready-Mixed Concrete Antitrust Litigation*
- *In re: Marine Hose Antitrust Litigation*
- *Iowa Ready Mixed Concrete Antitrust Litigation*
- *In re Potash Antitrust Litigation (II)*
- *In re Evanston Northwestern Healthcare Corp. Antitrust Litigation*
- *In re Polyurethane Foam Antitrust Litigation*
- *In re LIBOR-Based Financial Instruments Antitrust Litigation*
- *In re Lorazepam and Clorazepate Antitrust Litigation*
- *In re Cardizem CD Antitrust Litigation*
- *Vista Healthplan, Inc., and Ramona Sakiestewa v. Bristol-Myers Squibb Co., and American BioScience, Inc.*
- *In re Lupron Marketing and Sales Practices Litigation*
- *In re Terazosin Hydrochloride Antitrust Litigation*
- *In re Warfarin Sodium Antitrust Litigation*
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*
- *Carpenters and Joiners Welfare Fund, et al. v. SmithKline Beecham*
- *New Mexico United Food and Commercial Workers Union's and Employers' Health and Welfare Trust Fund, et al. v. Purdue Pharma L.P.*
- *In Re Pharmaceutical Industry Average Wholesale Price Litigation*
- *Alma Simonet, et al. v. SmithKline Beecham Corporation, d/b/a GlaxoSmithKline*
- *In re Relafen Antitrust Litigation*
- *In Re Remeron Direct Purchaser Antitrust Litigation*
- *In re TriCor Indirect Purchasers Antitrust Litigation*
- *Nichols, et al. v. SmithKline Beecham Corporation*
- *In re: DDAVP Indirect Purchaser Antitrust Litigation*

Securities Cases

- *Plymouth County Retirement Association v. Spectrum Brands Holdings, Inc., et al.*
- *Tung, et al. v. Dycom Industries, Inc., et al.*
- *Boutchard, et al. v. Gandhi, et al. ("Tower/e-Minis")*
- *MAZ Partners LP v. First Choice Healthcare Solutions, Inc.*
- *SEB Investment Management AB, et al. v. Symantec Corporation, et al.*
- *In re Impinj, Inc. Securities Litigation*
- *In re Netshoes Securities Litigation*
- *Yellowdog Partners, LP, et al. v. Curo Group Holdings Corp., et al.*
- *In re Brightview Holdings, Inc. Securities Litigation*
- *In re Obalon Therapeutics, Inc. Securities Litigation*
- *In re Willis Towers Watson PLC Proxy Litigation*
- *In re Blue Apron Holdings, Inc. Securities Litigation*
- *In re: Qudian Inc. Securities Litigation*
- *Plymouth County Contributory Retirement System v. Adamas Pharmaceuticals, et al.*
- *In re Perrigo Company PLC Securities Litigation*
- *Enriquez, et al. v. Nabriva Therapeutics PLC, et al.*
- *Teamsters Local 456 Pension Fund, et al. v. Universal Health Services, Inc., et al.*
- *Olenik, et al. v. Earthstone Energy, Inc.*

- *Shenk v. Mallinckrodt plc, et al.*
- *In re The Allstate Corp. Securities Litigation*
- *Christopher Vataj v. William D. Johnson, et al. (PG&E Securities II)*
- *Kirkland v. WideOpenWest, Inc.*
- *Oklahoma Police Pension and Retirement System v. Sterling Bancorp, Inc.*
- *In re Uxin Limited Securities Litigation*
- *City of Hallandale Beach Police Officers' & Firefighters' Personnel Retirement Trust v. Ergen, et al. (Echostar)*
- *Lewis v. YRC Worldwide Inc., et al.*
- *Tomaszewski v. Trenova, Inc., et al.*
- *In re Restoration Robotics, Inc. Securities Litigation*
- *Public Employees' Retirement Systems of Mississippi, et al. v. Treehouse Foods, Inc., et al.*
- *Ronald L. Jackson v. Microchip Technology, Inc., et al.*
- *In re Micro Focus International plc Securities Litigation*
- *In re Dynagas LNG Partners LP Securities Litigation*
- *Weiss, et al. v. Burke, et al. (Nutraceutical)*
- *Yaron v. Intersect ENT, Inc., et al.*
- *Utah Retirement Systems v. Healthcare Services Group, Inc., et al.*
- *In re PPDAI Group Inc. Securities Litigation*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *In re Aqua Metals, Inc. Securities Litigation*
- *St. Lucie County Fire District Firefighters' Pension Trust Fund v. Southwestern Energy Company*
- *In re CPI Card Group Inc. Securities Litigation*
- *Arkansas Teacher Retirement System, et al. v. Alon USA Energy, Inc., et al.*
- *In re TAL Education Group Securities Litigation*
- *GCI Liberty Stockholder Litigation*
- *In re SciPlay Corporation Securities Litigation*
- *In re Allergan Generic Drug Pricing Securities Litigation*
- *In re Vivint Solar, Inc. Securities Litigation*
- *In re YayYo Securities Litigation*
- *In re JPMorgan Treasury Futures Spoofing Litigation*
- *Searles, et al. v. Crestview Partners, LP, et al. (Capital Bank)*
- *In re Lyft, Inc. Securities Litigation*
- *In re Aegean Marine Petroleum Network, Inc. Securities Litigation*
- *In re JPMorgan Precious Metals Spoofing Litigation*
- *In re Pivotal Software, Inc. Securities Litigation*
- *Longo, et al. v. OSI Systems, Inc., et al.*
- *In re Homefed Corporation Stockholder Litigation*
- *Pierrelouis v. Gogo Inc., et al.*
- *Pope v. Navient Corporation, et al.*
- *In re Merit Medical Systems, Inc. Securities Litigation*
- *In re Frontier Communications Corporation Stockholder Litigation*
- *Holwill v. AbbVie Inc.*
- *Budicak, Inc., et al. v. Lansing Trade Group, LLC, et al. (SRW Wheat Futures)*
- *Yannes, et al. v. SCWorx Corporation*
- *In re Fannie Mae/Freddie Mac Senior Preferred Stock Purchase Agreement Class Action Litigations*
- *In re Myriad Genetics, Inc. Securities Litigation*
- *In re Chicago Bridge & Iron Co. N.V. Securities Litigation*
- *The Arbitrage Fund, et al. v. William Petty, et al. (Exactech)*
- *In re Columbia Pipeline Group, Inc. Merger Litigation*

- *Martinek v. AmTrust Financial Services, Inc.*
- *City of Pittsburgh Comprehensive Municipal Pension Trust Fund, et al. v. Benefitfocus, Inc., et al.*
- *In re: Evoqua Water Technologies Corp. Securities Litigation*
- *Laydon v. Mizuho Bank, Ltd., et al.*
- *Lomingkit, et al. v. Apollo Education Group, Inc., et al.*
- *In re Caraco Pharmaceutical Laboratories, Ltd. Shareholder Litigation*
- *Norfolk County Retirement System, et al. v. Community Health Systems, Inc., et al.*
- *Chester County Employees' Retirement Fund v. KCG Holdings, Inc., et al.*
- *Oklahoma Law Enforcement Retirement System, et al. v. Adeptus Health Inc., et al.*
- *Di Donato v. Insys Therapeutics, Inc., et al.*
- *Lundgren-Wiedinmyer, et al. v. LJM Partners, Ltd, et al.*
- *Martin, et al. v. Altisource Residential Corporation, et al.*
- *Stephen Appel, et al. v. Apollo Management, et al.*
- *In re Medley Capital Corporation Stockholder Litigation*
- *Forman, et al. v. Meridian BioScience, Inc., et al.*
- *Public Employees' Retirement System of Mississippi, et al. v. Endo International PLC, et al.*
- *In Re Flowers Foods, Inc. Securities Litigation*
- *Jiangchen, et al. v. Rentech, Inc., et al.*
- *In re Liberty Tax, Inc. Stockholder Litigation*
- *In re RH, Inc. Securities Litigation*
- *Lazan v. Quantum Corporation, et al.*
- *Nabhan v. Quantum Corporation, et al.*
- *Edmund Murphy III, et al. v. JBS S.A.*
- *Public Employees' Retirement System of Mississippi, et al. v. Sprouts Farmers Market, Inc., et al.*
- *In re Starz Stockholder Litigation*
- *Judith Godinez, et al. v. Alere Inc., et al.*
- *Rahman and Giovagnoli, et al. v. GlobalSCAPE, Inc., et al.*
- *Arthur Kaye, et al. v. ImmunoCellular Therapeutics, Ltd., et al.*
- *In re CPI Card Group Inc. Securities Litigation*
- *Daniel Aude, et al. v. Kobe Steel, Ltd., et al.*
- *In re Quality Systems, Inc. Securities Litigation*
- *Cooper, et al. v. Thoratec Corporation, et al.*
- *Washtenaw County Employees' Retirement System, et al. v. Walgreen Co., et al.*
- *Elkin v. Walter Investment Management Corp., et al.*
- *In Re CytRx Corporation Securities Litigation*
- *Ranjit Singh, et al. v. 21Vianet Group, Inc., et al.*
- *In re PTC Therapeutics, Inc. Securities Litigation*
- *Securities and Exchange Commission v. Mark A. Jones*
- *In re Sequans Communications S.A. Securities Litigation*
- *In re Henry Schein, Inc. Securities Litigation*
- *Ronge, et al. v. Camping World Holdings, Inc., et al.*
- *Oklahoma Firefighters Pension & Retirement System v. Lexmark International, Inc.*
- *Christakis Vrakas, et al. v. United States Steel Corporation, et al.*
- *Emerson et al. v. Mutual Fund Series Trust, et al. ("Catalyst")*
- *In re Fannie Mae 2008 Securities Litigation*
- *In re Anadarko Petroleum Corporation Class Action Litigation*
- *Ge Dandong, et al., v. Pinnacle Performance Limited, et al.*
- *In Re: Rough Rice Commodity Litigation*
- *Xuechen Yang v. Focus Media Holding Limited et al.*
- *In re Massey Energy Co. Securities Litigation*

- *In re Swisher Hygiene, Inc.*
- *The City of Providence vs. Aeropostale, Inc., et al.*
- *In re Metrologic Instruments, Inc. Shareholders Litigation*
- *Public Pension Fund Group v. KV Pharmaceutical Company et al.*
- *Pension Trust Fund for Operating Engineers, et al. v. Assisted Living Concepts, Inc., et al.*
- *In re Lehman Brothers Equity/Debt Securities Litigation*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*
- *In re: Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*
- *In re General Electric Co. Securities Litigation*
- *In re CNX Gas Corporation Shareholders Litigation*
- *Oscar S. Wyatt, Jr. et al. v. El Paso Corporation, et al.*
- *In re Par Pharmaceutical Securities Litigation*
- *In re Par Pharmaceutical Companies, Inc. Shareholders Litigation*
- *In re Delphi Financial Group Shareholders Litigation*
- *In re SLM Corporation Securities Litigation*
- *In re Del Monte Foods Company Shareholder Litigation*
- *Leslie Niederklein v. PCS Edventures!.com, Inc. and Anthony A. Maher*
- *In re Beckman Coulter, Inc. Securities Litigation*
- *Michael Rubin v. MF Global, Ltd., et al.*
- *Allen Zaretkin v. Fidelity Management & Research Company, et al.*
- *In re BP Prudhoe Bay Royalty Trust Securities Litigation*
- *Police and Fire Retirement System of the City of Detroit et al. v. SafeNet, Inc., et al.*
- *In re Limelight Networks, Inc. Securities Litigation*
- *In re Gilead Sciences Securities Litigation*
- *In re ACS Shareholder Litigation, Consolidated C.A. No. 4940-VCP*
- *Lance Provo v. China Organic Agriculture, Inc., et al.*
- *In re LDK Solar Securities Litigation*

Labor & Employment Cases

- *Verizon OFCCP Settlement*
- *Alvarez, et al. v. GEO Secure Services, LLC*
- *Sartena v. Meltwater FLSA*
- *Carmen Alvarez, et al. v. Chipotle Mexican Grill, Inc., et al.*
- *Turner, et al. v. Chipotle Mexican Grill, Inc.*
- *Long, et al. v. Southeastern Pennsylvania Transportation Authority*
- *Matheson, et al. v. TD Bank, N.A.*
- *Ludwig, et al. v. General Dynamics Information Technology, Inc., et al.*
- *Bedel, et al. v. Liberty Mutual Group Inc.*
- *Irene Parry, et al. v. Farmers Insurance Exchange, et al.*
- *Maldonado v. The GEO Group, Inc.*
- *Alderman and Maxey v. ADT, LLC*
- *Albaceet v. Dick's Sporting Goods*
- *Rodriguez v. The Procter & Gamble Company*
- *Adekunle, et al. v. Big Bang Enterprises, Inc. d/b/a The Revenue Optimization Companies*
- *Gorski, et al. v. Wireless Vision, LLC*
- *Lopez, et al. v. New York Community Bank, et al.*
- *Hamilton, et al. v. The Vail Corporation, et al.*
- *Eisenman v. The Ayco Company L.P.*
- *Matheson v. TD Bank, N.A.*

- *Simon v. R.W. Express LLC, d/b/a Go Airlink NYC*
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- *American Federation of Government Employees, Local 1145 v. Federal Bureau of Prisons, U.S. Penitentiary, Atlanta, Georgia*
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- *In re 2014 Avon Products, Inc. ERISA Litigation*
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- *Taronica White, et al. v. Attorney General Loretta Lynch, Department of Justice*
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- *Hunter v. J.S.T. Corp. BIPA Settlement*
- *Atkinson, et al. v. Minted, Inc.*
- *Rosenbach, et al. v. Six Flags Entertainment Corporation and Great America LLC*
- *Pratz, et al. v. MOD Super Fast Pizza, LLC*
- *The State of Indiana v. Equifax Data Breach Settlement*
- *In re: Vizio, Inc. Consumer Privacy Litigation*
- *In re: Google, Inc. Street View Electronic Communications Litigation*
- *Devin Briggs and Bobby Watson, et al. v. Rhinoag, Inc. ("Briggs Biometric Settlement")*
- *Trost v. Pretium Packaging L.L.C.*

- *In re: Barr, et al. v. Drizly, LLC f/k/a Drizly, Inc., et al.*

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- *Perrong, et al. v. Orbit Energy & Power, LLC*
- *Baldwin, et al. v. Miracle-Ear, Inc.*
- *Floyd and Fabricant, et al. v. First Data Merchant Services LLC, et al.*
- *Hoffman, et al. v. Hearing Help Express, Inc., et al.*
- *Lowe and Kaiser, et al. v. CVS Pharmacy, Inc., et al.*
- *Johansen v. HomeAdvisor, Inc., et al.*
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- *Hopkins, et al. v. Modernize, Inc.*
- *Diana Mey vs. Frontier Communications Corporation*
- *Matthew Donaca v. Dish Network, L.L.C.*
- *Matthew Benzion and Theodore Glaser v. Vivint, Inc.*
- *John Lofton v. Verizon Wireless (VAW) LLC, et al.*
- *Lori Shamblin v. Obama for America, et al.*
- *Ellman v. Security Networks*

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